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Attorney for Plaintiffs and Counterclaim-Defendants
BASKARAN MANIVANNAN;
SURYANARAYANA MANGIPUDI; and
CHERYL EHLMAN

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – OAKLAND DIVISION

BASKARAN MANIVANNAN;
SURYANARAYANA MANGIPUDI; and
CHERYL EHLMAN,

Plaintiffs,

v.

CLYPIT, INC., dba CLYP,
CLYPTECH.com, CLYPMEDIA.com,

Defendant.

CLYPIT, INC., dba CLYP,
CLYPTECH.com, CLYPMEDIA.com,

Counterclaim-Plaintiff,

v.

BASKARAN MANIVANNAN;
SURYANARAYANA MANGIPUDI; and
CHERYL EHLMAN,

Counterclaim-Defendants.

CASE NO. 4:14-cv-05602-KAW

**STIPULATION AND ~~[PROPOSED]~~ ORDER
OF DISMISSAL WITH PREJUDICE**

STIPULATION

WHEREAS, Plaintiffs and Counterclaim-Defendants BASKARAN MANIVANNAN,
SURYANARAYANA MANGIPUDI, and CHERYL EHLMAN (collectively “Plaintiffs”) filed
this action against Defendant and Counterclaim-Plaintiff CLYPIT, INC. dba CLYP,

CLYPTECH.com, CLYPMEDIA.com (collectively “Defendant,” and with Plaintiffs, the “Parties”) alleging claims for: (1) Rescission, (2) Declaratory Relief, (3) Copyright Infringement, (4) False Advertising, (5) Unfair Competition, (6) Misappropriation of Trade Secrets, and (7) False Advertisement and Unfair Competition under Lanham Act.

WHEREAS, Defendant and Counterclaim-Plaintiff CLYPIT, INC. dba CLYP, CLYPTECH.com, CLYPMEDIA.com filed a counterclaim seeking an order adjudicating Copyright Registration No. TXu001916069, obtained by Plaintiffs from the United States Copyright Office, to be invalid and unenforceable due to procurement by fraud.

WHEREAS, the Parties have entered into a written settlement agreement, by which all Parties have agreed to release their claims and counterclaims.

THEREFORE, PLAINTIFFS AND DEFENDANT HEREBY STIPULATE, by and through their respective counsel of record to dismiss the above-captioned matter with prejudice, each party to bear its own attorneys’ fees and costs.

Respectfully submitted,

Dated: 9/15/2015

BURGOYNE LAW GROUP

/s/Henry M. Burgoyne

Henry M. Burgoyne, III
Counsel for Plaintiffs

Dated: 9/15/2015

LAW OFFICES OF THOMAS V. CHRISTOPHER

/s/ Thomas V. Christopher

Thomas V. Christopher
Counsel for Defendant

ORDER

Based on the stipulation of the parties, and good cause appearing therefore,

IT IS ORDERED that this action be, and hereby is, DISMISSED WITH PREJUDICE,
each side to bear its own attorneys' fees and costs.

Dated: 9/18/15


MAGISTRATE JUDGE KANDIS A. WESTMORE